

September 29, 2016

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation

Wireless Telecommunications Bureau, Public Safety and Homeland Security Bureau, and Office of Engineering and Technology Seek Comment on Request Filed by the International Municipal Signal Association for Waiver of Section 90.203(j)(4)-(5) of the Commission's Rules; WT Docket No. 99-87

Dear Ms. Dortch:

On September 27, 2016, Ralph Haller, representing the International Municipal Signal Association ("IMSA") and the undersigned counsel for IMSA met with the following members of the Commission's staff regarding the above referenced matter:

Scot Stone (Wireless Telecommunications Bureau)
Melvin Spann (Wireless Telecommunications Bureau)
John Evanoff (Public Safety and Homeland Security Bureau)
Brian Marenco (Public Safety and Homeland Security Bureau)

We explained that current Commission requirements that Part 90 equipment be capable of operating with 6.25 kHz channels or equivalent will unnecessarily drive up prices for some segments of the market for which low-cost radios are preferred and available today. Manufacturers of these low-cost devices that wish to upgrade their equipment in a manner that requires new equipment authorization will be required to incorporate 6.25 kHz capabilities that will drive prices up. We noted that grant of the relief requested will not reverse the progress the Commission has already made toward migrating users to narrowband equipment; most large public safety systems already plan to implement narrowband technologies and will continue to do so as standards are developed.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and provided to the FCC staff shown below.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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Please direct any questions regarding this filing to the undersigned.

Respectfully,

/s/ Russell H. Fox

Russell H. Fox

cc (each via e-mail):

Scot Stone
Melvin Spann
John Evanoff
Brian Marenco